Exhibit B

ZHP Deponents

January 2021

Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
28	29	30	31	1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
		John Iozzia (Confirmed)				
25	26	27	28	29	30	31
	Lijie Wang (Confirmed)	Lijie Wang (1/2)*				

***Not offered by ZHP, but needed to accommodate 30(b)(6) topics.**

February 2021

Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
1	2	3	4	5	6	7
	Remonda Gergis (Confirmed)					
8	9	10	11	12	13	14
		Hai Wang*	Hai Wang	Hai Wang (1/2)*		
15	16	17	18	19	20	21
		Jun Du				
22	23	24	25	26	27	28

***Not offered by ZHP, but needed to accommodate 30(b)(6) topics.**

March 2021

Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
1	2	3	4	5	6	7
Minli Zhang*	Minli Zhang	Minli Zhang & Qiangming Li*	Qiangming Li & Xiaodi Guo**	Qiangming Li & Xiaodi Guo**		
8	9	10	11	12	13	14
Wen-Chien (Eric) Tsai**	Hong (Eric) Gu & Wen-Chien (Eric) Tsai**	Hong (Eric) Gu, Jucai Ge,* & Yanfeng (Lucy) Liu**	Jucai Ge & Yanfeng (Lucy) Liu**	Jucai Ge		
15	16	17	18	19	20	21
	Lihong (Linda) Lin &Yuelin Hu**	Lihong (Linda) Lin, Yuelin Hu,** & Min Li*	Min Li & Mi (Karen) Xu**	Min Li & Mi (Karen) Xu**		
22	23	24	25	26	27	28
		Jie (Jay) Wang & Fengyang (Xavier) Tang**	Jie (Jay) Wang & Fengyang (Xavier) Tang**			
29	30	31	1	2	3	4
Peng Dong*	Peng Dong	Peng Dong	Baohua Chen			

***Not offered by ZHP, but needed to accommodate 30(b)(6) topics.**

****Fact witness with multiple days of availability, but only one day needed.**

1. **John Iozzia, Director of Sales at Huahai U.S., Inc. from 2011-Present (January 20, 2021 (1 day), Confirmed)**

   Not a 30(b)(6) witness

2. Lijie Wang, Vice President of Regulatory Affairs at Prinston Pharmaceuticals, Inc. from 2017-Present
(January 26-27, 2021 (1.5 days), Partially Confirmed)
7 Topics

On behalf of Prinston Pharmaceuticals Inc.:

Process Development

36. ZHP's evaluation and knowledge of the health risks of nitrosamines including NDMA and NDEA, including but not limited to as a contaminant of ZHP's valsartan API, and ZHP's valsartan finished dose.

Communications with Regulatory Agencies

38. The communications with any regulatory authority, including but not limited to the FDA, with regard to the modifications with regard to the use of solvents, and the Tetrazole ring formation step, in the manufacturing process for ZHP's valsartan API.

39. The communications with any regulatory authority, including but not limited to the FDA, with regard to the modifications with regard to the use of solvents, and the Tetrazole ring formation step, in the manufacturing process for ZHP's finished dose.

40. Disclosures by or on behalf of ZHP, Huahai US, Inc., Solco, and/or Prinston to regulatory authorities including the FDA, with regard to the actual or potential contamination of ZHP's valsartan API with nitrosamines including NDMA and NDEA.

On behalf of Huahai U.S., Inc.:

38. The communications with any regulatory authority, including but not limited to the FDA, with regard to the modifications with regard to the use of solvents, and the Tetrazole ring formation step, in the manufacturing process for ZHP's valsartan API.

40. Disclosures by Huahai or by Huahai on behalf of ZHP, Solco, and/or Prinston to regulatory authorities, including the FDA, with regard to the actual or potential contamination of ZHP's valsartan API with nitrosamines including NDMA and/or NDEA.

41. ZHP's filings by Huahai or by Huahai on behalf of ZHP, Solco, and/or Prinston with regulatory authorities, including the FDA, regarding manufacturing process changes for ZHP's Valsartan API Drug Master Filings.

3. Remonda Gergis, Vice President of Quality Assurance at Prinston Pharmaceuticals, Inc. from 2016-Present, at Huahai U,S,, Inc. from 2009-2016) (February 2, 2021 (1 day), Confirmed)

Not a 30(b)(6) witness.

4. Hai Wang, President of Solco Healthcare U.S. from 2017-Present, at Prinston Pharmaceuticals, Inc. from 2016-2017, and Huahai U.S., Inc. from 2005-2016 (February 10-12, 2021 (2.5 days))
19 Topics

On behalf of Zhejiang Huahai Pharmaceutical Co., Ltd:

ZHP's Communications with API and Finished Dose Customers and Downstream Customers

44. ZHP's oral and written communications with ZHP's valsartan finished dose customers or other downstream entities (i.e. wholesalers, retailers, consumers, TPP's) regarding quality, purity, or contamination issues related to the ZHP valsartan finished dose. **(Together with Minli Zhang)**

47. All credits, indemnification, refunds, and/or penalties paid or provided by or to ZHP in connection with the nitrosamine contamination of ZHP's valsartan API and ZHP's valsartan finished dose. **(For Finished Dose, Jie Wang for API)**

Product Tracing

51. Tracing of batches and lots of ZHP's valsartan finished dose sold downstream and ultimately intended for use by consumers in the United States.

53. The pricing of ZHP's valsartan finished dose that was ultimately sold in the United States.

55. The gross and net profits to ZHP from the sale of ZHP's valsartan finished dose in the United States.

57. The quantity/units of ZHP's valsartan finished dose sold in the United States.

59. The ZHP valsartan finished dose sales and pricing data produced by you in this litigation (sample documents to be provided at least 30 days in advance of deposition during the meet and confer process).

On behalf of Prinston Pharmaceuticals, Inc.:

Communications with API and Finished Dose Customers and Downstream Customers

44. Oral and written communications by or on behalf of ZHP, Huahai US, Inc., Solco, and/or Prinston with their valsartan finished dose customers or other downstream entities (i.e. wholesalers, retailers, consumers, TPP's) regarding quality, purity, or contamination issues related to the ZHP valsartan finished dose.

46. ZHP's product recall for ZHP's valsartan API or ZHP's valsartan finished dose, including who ZHP, Huahai US, Inc., Solco, and/or Prinston communicated with, how, about what, and the retention of recalled or sequestered ZHP valsartan API or ZHP valsartan finished dose.

On behalf of Solco Healthcare US.:

Testing of Valsartan API

20. The extent of the actual and potential nitrosamine contamination of ZHP's valsartan API and finished dose sold in the United States, both in terms of the concentration per pill, and across all of the lots/batches.

Communications with API and Finished Dose Customers and Downstream Customers

44. Oral and written communications by or on behalf of ZHP, Huahai US, Inc., Solco, and/or Prinston with their valsartan finished dose customers or other downstream entities (i.e. wholesalers, retailers, consumers, TPP's) regarding quality, purity, or contamination issues related to the ZHP valsartan finished dose.

45. Oral and written statements (defined to include representations and warranties) by or on behalf of ZHP, Huahai US, Inc., Solco, and/or Prinston to finished dose manufacturers, wholesalers, retailers, and consumers with regard to the contents and purity of ZHP's valsartan API or ZHP's valsartan finished dose.

46. ZHP's product recall for ZHP's valsartan API or ZHP's valsartan finished dose, including who ZHP, Huahai US, Inc., Solco, and/or Prinston communicated with, how, about what, and the retention of recalled or sequestered ZHP valsartan API or ZHP valsartan finished dose.

47. All credits, indemnification, refunds, and/or penalties paid or provided by or to ZHP, Huahai US, Inc., Solco, and/or Prinston in connection with the nitrosamine contamination of ZHP's valsartan API and ZHP's valsartan finished dose.

Product Tracing

51. Tracing of batches and lots of ZHP's valsartan finished dose sold downstream and ultimately intended for use by consumers in the United States.

53. The pricing of ZHP's valsartan finished dose that was ultimately sold in the United States.

55. The gross and net profits to ZHP, Huahai US, Inc., Solco, and/or Prinston from the sale of ZHP's valsartan finished dose in the United States.

57. The quantity/units of ZHP's valsartan finished dose sold in the United States.

59. The ZHP valsartan finished dose sales and pricing data produced by you in this litigation (sample documents to be provided at least 30 days ahead of deposition during meet and confer process).

5. Jun Du, Executive Vice President at Zhejiang Huahai Pharmaceutical Co., Ltd, CEO of Prinbury Biopharm. Co., Ltd., Huahai U.S., Inc., Prinston Pharmaceuticals Inc., and Solco Healthcare U.S., With the Company Since at Least 2000 (February 17, 2021 (1 day))

Not a 30(b)(6) witness.

6. Minli Zhang, Director of Finished Dose Formulation Quality at Zhejiang Huahai Pharmaceutical Co., Ltd from 2001-Present
(March 1-3, 2021 (3 days))
20 Topics

On behalf of Zhejiang Huahai Pharmaceutical Co., Ltd:

Testing of Valsartan API

4. The testing performed by ZHP or its agents, to evaluate the purity and contents of ZHP's finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

6. The testing performed by any entity or person other than ZHP or its agents but known to ZHP, to evaluate the purity and contents of ZHP's finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

8. The chromatogram and mass spectrometry results for all testing by ZHP or its agents of ZHP's finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

10. The chromatogram and mass spectrometry results for all testing by any entity or person other than ZHP or its agents but known to ZHP, of ZHP's finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

13. The chromatogram and mass spectrometry results for all testing by ZHP or its agents of the solvents utilized in the manufacture of ZHP's finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

15. The chromatogram and mass spectrometry results for all testing by any entity or person other than ZHP or its agents but known to ZHP, of the solvents utilized in the manufacture of ZHP's finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

17. The chromatogram and mass spectrometry results for all testing by ZHP or its agents of the production equipment utilized in the manufacture of ZHP's valsartan finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

19. The chromatogram and mass spectrometry results for all testing by any entity or person other than ZHP or its agents but known to ZHP, of the production equipment utilized in the manufacture of ZHP's finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States..

20. The extent of the actual and potential nitrosamine contamination of ZHP's valsartan API and finished dose sold in the United States, both in terms of the concentration per pill, and across all of the lots/batches. **(For Finished Dose, Qiangming Li for API)**

Quality Assurance and Quality Control Activities

22. ZHP's Standard Operating Procedures ("SOPs"), policies or procedures intended to prevent, detect, or act in response to any impurity or contamination, for example carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, in connection with the manufacture and contents of ZHP's valsartan finished dose (regardless of intended sale location) in any facility that manufactured ZHP's finished dose for sale in the United States. (The parties to meet and confer to identify the relevant SOP's, policies, or procedures.)

24. ZHP's application of cGMPs intended to prevent, detect, or act in response to any impurity or contamination, for example carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, in connection with the manufacture of ZHP's finished dose (regardless of intended sale location) in any facility that manufactured ZHP's finished dose for sale in the United States. (The parties to meet and confer to identify the relevant cGMP's.)

26. The distinction between technical inquiries and deviation reports, as those terms are defined in ZHP's documents and in the ordinary course of business. **(For Finished Dose, Jucai Ge for API)**

27. The processes and procedures for handling technical inquiries. **(For Finished Dose, Jucai Ge for API)**

28. The processes and procedures for handling deviation reports. **(For Finished Dose, Jucai Ge for API)**

30. The technical inquiries received by ZHP relating to ZHP's valsartan Finished Dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

32. The deviation reports drafted by or received by ZHP relating to ZHP's valsartan Finished Dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's finished dose for sale in the United States.

ZHP's Communications with API and Finished Dose Customers and Downstream Customers

44. ZHP's oral and written communications with ZHP's valsartan finished dose customers or other downstream entities (i.e. wholesalers, retailers, consumers, TPP's) regarding quality,

purity, or contamination issues related to the ZHP valsartan finished dose. **(Together with Hai Wang)**

45. ZHP's oral and written statements (defined to include representations and warranties) to finished dose manufacturers, wholesalers, retailers, and consumers with regard to the contents and purity of ZHP's valsartan API or ZHP's valsartan finished dose.

46. ZHP's product recall for ZHP's valsartan API or ZHP's valsartan finished dose, including who ZHP communicated with, how, about what, and the retention of recalled or sequestered ZHP valsartan API or ZHP valsartan finished dose.

Compliance with cGMPs

48. ZHP's compliance or non-compliance with cGMPs intended to prevent, detect, or act in response to any impurity or contamination, for example carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, as it relates to the manufacture, quality assurance, quality control, and sale of ZHP's API and ZHP's valsartan finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API and ZHP's valsartan finished dose for sale in the United States. **(For Finished Dose, Jucai Ge for API)**

7. Qiangming Li, Senior Director of Analysis (Quality Control) at Zhejiang Huahai Pharmaceutical Co., Ltd. from 2013-Present
(March 3-5, 2021 (2.5 days))
9 Topics

On behalf of Zhejiang Huahai Pharmaceutical Co., Ltd:

Testing of Valsartan API

3. The testing performed by ZHP or its agents, to evaluate the purity and contents of ZHP's API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States.

5. The testing performed by any entity or person other than ZHP or its agents but known to ZHP, to evaluate the purity and contents of ZHP's valsartan API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States.

7. The chromatogram and mass spectrometry results for all testing by ZHP or its agents of ZHP's valsartan API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States. **(Together with Min Li)**

9. The chromatogram and mass spectrometry results for all testing by any entity or person other than ZHP or its agents but known to ZHP, of ZHP's valsartan API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States.

12. The chromatogram and mass spectrometry results for all testing by ZHP or its agents of the solvents utilized in the manufacture of ZHP's valsartan API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States.

14. The chromatogram and mass spectrometry results for all testing by any entity or person other than ZHP or its agents but known to ZHP, of the solvents utilized in the manufacture of ZHP's API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States.

16. The chromatogram and mass spectrometry results for all testing by ZHP or its agents of the production equipment utilized in the manufacture of ZHP's valsartan API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States.

18. The chromatogram and mass spectrometry results for all testing by any entity or person other than ZHP or its agents but known to ZHP, of the production equipment utilized in the manufacture of ZHP's valsartan API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States.

20. The extent of the actual and potential nitrosamine contamination of ZHP's valsartan API and finished dose sold in the United States, both in terms of the concentration per pill, and across all of the lots/batches. **(For API, Minli Zhang for Finished Dose)**

8. Xiaodi Guo, Executive Vice President of Huahai U.S., Inc., Prinston Pharmaceuticals, Inc., and Solco Healthcare U.S., Chief Scientific Officer of Prinbury, with the Company Since 2005-Present
(March 4-5, 2021 (1 day))

Not a 30(b)(6) witness.

9. Wen-Chien (Eric) Tsai, General Manager of Prinbury Biopharm. Co., Ltd. from 2009-Present
(March 8-9, 2021 (1 day))

Not a 30(b)(6) witness.

10. Hong (Eric) Gu, President of Shanghai Syncores Technologies, Inc. from 2014-Present
(March 9-10, 2021 (2 days))
2 Topics

On behalf of Zhejiang Huahai Pharmaceutical Co., Ltd:

Process Development

35. Any evaluation conducted by or on behalf of ZHP with regard to health or safety issues arising from the use of solvents, and the Tetrazole ring formation step, in the manufacturing process for ZHP's valsartan API (regardless of intended sale location) in any facility that manufactured ZHP's valsartan API for sale in the United States. **(Together with Peng Dong)**

35A. ZHP's evaluation and knowledge of the risk of the creation of nitrosamines including NDMA and NDEA as a result of the manufacturing process for ZHP's valsartan API (regardless of intended sale location) in any facility that manufactured ZHP's valsartan API for sale in the United States.

11. Jucai Ge, Director of API Quality Assurance at Zhejiang Huahai Pharmaceutical Co., Ltd from 2000-Present
(March 10-12, 2021 (3 days))
12 Topics

On behalf of Zhejiang Huahai Pharmaceutical Co., Ltd:

Testing of Valsartan API

2. The root cause investigation for the nitrosamine impurities, including NDMA and NDEA in the ZHP API. **(Together with Min Li)**

Quality Assurance and Quality Control Activities

21. ZHP's Standard Operating Procedures ("SOPs"), policies or procedures intended to prevent, detect, or act in response to any impurity or contamination, for example carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, in connection with the manufacture and contents of ZHP's valsartan API (regardless of intended sale location) in any facility that manufactured ZHP's valsartan API for sale in the United States. (The parties to meet and confer to identify the relevant SOP's, policies, or procedures.)

23. ZHP's application of cGMPs intended to prevent, detect, or act in response to any impurity or contamination, for example carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, in connection with the manufacture of ZHP's valsartan API (regardless of intended sale location) in any facility that manufactured ZHP's valsartan API for sale in the United States. (The parties to meet and confer to identify the relevant cGMP's.)

25. The "relevant SOP's, QS, testing method, validation reports, equipment calibration records, preventive maintenance plan and change control records, etc." referenced at b.6. on ZHP00004355.

26. The distinction between technical inquiries and deviation reports, as those terms are defined in ZHP's documents and in the ordinary course of business. **(For API, Minli Zhang for Finished Dose)**

27. The processes and procedures for handling technical inquiries. **(For API, Minli Zhang for Finished Dose)**

28. The processes and procedures for handling deviation reports. **(For API, Minli Zhang for Finished Dose)**

29. The technical inquiries received by ZHP relating to ZHP's valsartan API, (regardless of intended sale location) in any facility that manufactured ZHP's valsartan API for sale in the United States.

31. The deviation reports drafted by or received by ZHP relating to ZHP's valsartan API (regardless of intended sale location) in any facility that manufactured ZHP's valsartan API for sale in the United States.

ZHP's Communications with API and Finished Dose Customers and Downstream Customers

46. ZHP's product recall for ZHP's valsartan API or ZHP's valsartan finished dose, including who ZHP communicated with, how, about what, and the retention of recalled or sequestered ZHP valsartan API or ZHP valsartan finished dose. **(For API, Minli Zhang for Finished Dose)**

Compliance with cGMPs

48. ZHP's compliance or non-compliance with cGMPs intended to prevent, detect, or act in response to any impurity or contamination, for example carcinogens, general toxic impurities (including genotoxic impurities) such as nitrosamines, and residual solvents, as it relates to the manufacture, quality assurance, quality control, and sale of ZHP's API and ZHP's valsartan

finished dose (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API and ZHP's valsartan finished dose for sale in the United States. **(For API, Minli for Finished Dose)**

49. The "GMP and process training" referenced in the Personnel section on ZHP00004368.

12. Yanfeng (Lucy) Liu, Deputy Director & Manager of API Registration, at Zhejiang Huahai Pharmaceutical Co., Ltd from 2003-Present (March 10-11, 2021 (1 day))

Not a 30(b)(6) witness.

13. Lihong (Linda) Lin, Director of Regulatory Affairs at Zhejiang Huahai Pharmaceutical Co., Ltd from 1997-Present
(March 16-17, 2021 (2 days))
4 Topics

On behalf of Zhejiang Huahai Pharmaceutical Co., Ltd:

Communications with Regulatory Agencies

38. The communications with any regulatory authority, including but not limited to the FDA, with regard to the modifications with regard to the use of solvents, and the Tetrazole ring formation step, in the manufacturing process for ZHP's valsartan API.

39. The communications with any regulatory authority, including but not limited to the FDA, with regard to the modifications with regard to the use of solvents, and the Tetrazole ring formation step, in the manufacturing process for ZHP's finished dose.

40. ZHP's disclosures to regulatory authorities, including the FDA, with regard to the actual or potential contamination of ZHP's valsartan API with nitrosamines including NDMA and NDEA.

41. ZHP's filings with regulatory authorities, including the FDA, regarding manufacturing process changes for ZHP's Valsartan API Drug Master Filings.

14. Yuelin Hu, Assistant Director of Quality Operation, Department I, at Zhejiang Huahai Pharmaceutical Co., Ltd from 2005-Present (March 16-17, 2021 (1 day))

Not a 30(b)(6) witness.

15. Min Li, Vice President of Analysis and Testing at Zhejiang Huahai Pharmaceutical Co., Ltd from 2014-Present
(March 17-19, 2021 (2.5 days))
4 Topics

On behalf of Zhejiang Huahai Pharmaceutical Co., Ltd:

Testing of Valsartan API

1. The cause of the contamination of ZHP's valsartan API with nitrosamines including NDMA.

2. The root cause investigation for the nitrosamine impurities, including NDMA and NDEA in the ZHP API. **(Together with Jucai Ge)**

7. The chromatogram and mass spectrometry results for all testing by ZHP or its agents of ZHP's valsartan API (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States. **(Together with Qiangming Li)**

Process Development

36. ZHP's evaluation and knowledge of the health risks of nitrosamines including NDMA and NDEA, including but not limited to as a contaminant of ZHP's valsartan API, and ZHP's valsartan finished dose.

16. Mi (Karen) Xu, Senior Director of Market Development, at Zhejiang Huahai Pharmaceutical Co., Ltd from 2007-Present
(March 18-19, 2021 (1 day))

Not a 30(b)(6) witness.

17. Jie (Jay) Wang, Vice President of Business Development at Zhejiang Huahai Pharmaceutical Co., Ltd from 2013-Present
(March 24-25, 2021 (2 days))
8 Topics

On behalf of Zhejiang Huahai Pharmaceutical Co., Ltd:

ZHP's Communications with API and Finished Dose Customers and Downstream Customers

42. ZHP's oral and written communications with Novartis with regard to the content/purity/contamination of ZHP's valsartan API.

43. ZHP's oral and written communications with ZHP's valsartan API Customers or other downstream entities (i.e. wholesalers, retailers, consumers, TPP's) regarding quality, purity, or contamination issues related to the ZHP valsartan API.

47. All credits, indemnification, refunds, and/or penalties paid or provided by or to ZHP in connection with the nitrosamine contamination of ZHP's valsartan API and ZHP's valsartan finished dose. **(For API, Hai Wang for Finished Dose)**

Product Tracing

50. Tracing of batches and lots of ZHP's valsartan API sold downstream and ultimately intended for use by consumers in the United States.

52. The pricing of ZHP's valsartan API that as ultimately sold in the United States.

54. The gross and net profits to ZHP from the sale of ZHP's valsartan API in the United States.

56. The quantity/units of ZHP's valsartan API sold in the United States.

58. The ZHP valsartan API sales and pricing data produced by you in this litigation (sample documents to be provided at least 30 days in advance of deposition during the meet and confer process).

18. Fengyang (Xavier) Tang, Assistant Manager of Market Development, Group I, at Zhejiang Huahai Pharmaceutical Co., Ltd from 2014-Present (March 24-25, 2021 (1 day))

Not a 30(b)(6) witness.

19. Peng Dong, Deputy Director of Technology, Department I, at Zhejiang Huahai Pharmaceutical Co., Ltd from 2006-Present
(March 29-31, 2021 (2.5 days))
5 Topics

On behalf of Zhejiang Huahai Pharmaceutical Co., Ltd:

Testing of Valsartan API

11. ZHP's evaluation of the potential risks to the purity or contents of ZHP's valsartan API posed or caused by solvents used during the manufacturing process (regardless of intended sale location) manufactured in any facility that manufactured ZHP's valsartan API for sale in the United States.

Process Development

33. The "primary process validation of Process II (Zn cl2) completed in April 2012" referenced on ZHP00004372.

34. The modifications with regard to the use of solvents, and the Tetrazole ring formation step, in the manufacturing process for ZHP's valsartan API, including: (1) the reasons for the modifications, (2) the testing and evaluation in connection with the modification, and (3) the relationship between the modifications and the nitrosamine contamination of ZHP's valsartan API (regardless of intended sale location) in any facility that manufactured ZHP's valsartan API for sale in the United States.

35. Any evaluation conducted by or on behalf of ZHP with regard to health or safety issues arising from the use of solvents, and the Tetrazole ring formation step, in the manufacturing process for ZHP's valsartan API (regardless of intended sale location) in any facility that manufactured ZHP's valsartan API for sale in the United States. **(Together with Hong (Eric) Gu)**

37. The process changes referenced in section 3.4.1 on ZHP00004371.

20. Baohua Chen, General Manager of Zhejiang Huahai Pharmaceutical Co., Ltd, CEO of Shanghai Syncores Technologies, Inc., Founded Company in 1989 (April 1, 2021 (1 day))

Not a 30(b)(6) witness.